



South Coast  
Air Quality Management District

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E-Mailed: December 9, 2010

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Mr. Mark Tomich  
Development Services Director  
City of Colton  
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650 N. La Cadena Drive  
Colton, CA 62324

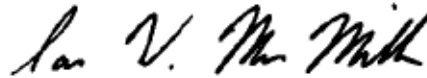
**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Colton Soil Safe Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the revised or final CEQA document as appropriate.

The AQMD staff is concerned that the lead agency has not demonstrated that the proposed project will have less than significant air quality impacts. Specifically, the lead agency failed to quantify all potential diesel truck emissions during construction of the proposed project resulting in an underestimate of air quality impacts. Further, the lead agency failed to conduct a localized air quality analysis consistent with the AQMD's methodology for localized significance thresholds (LST). Without accurately quantifying all construction emissions and localized air quality impacts the lead agency is unable to support its conclusion that the project will have less than significant air quality impacts. Therefore, AQMD staff requests that the lead agency revise the CEQA document to include a revised air quality analysis. In the event that the lead agency's revised CEQA document demonstrates additional significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines.

AQMD staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

[IM:DG](#)

SBC101026-05  
Control Number

### Quantification of Construction Emissions

1. The AQMD staff is concerned that the lead agency has failed to quantify all construction emissions from the proposed project resulting in an underestimate of air quality impacts. In chapter two (Project Description) of the draft EIR the lead agency states that the proposed project will require up to 60 trucks per day to deliver soil material to the project site, further, the lead agency states that the soil will be imported from a maximum distance of 75 miles to the project site. Given this technical information in the Project Description the AQMD staff estimates that the proposed project will generate diesel emissions from 4,500 vehicle miles traveled (VMT) per day. However, based on the URBEMIS output sheets in Appendix E of the draft EIR the lead agency estimated the project's air quality impacts based on a total of 668 VMT per day which equates to less than nine (9) diesel truck trips per day to the project site. As a result, AQMD staff is concerned that the lead agency has underestimated the project's regional, localized and GHG emissions impacts. Therefore, the AQMD staff requests that the lead agency revise the air quality analysis to include all potential emissions from delivery trucks to the project site.

### Localized Construction Emission Impacts

2. The proposed project site is adjacent to a residential community (i.e., sensitive land use); therefore, AQMD staff recommends that in addition to the regional air quality analysis and health risk assessment prepared in the draft EIR the lead agency calculate the project's localized air quality impacts. The AQMD staff recognizes that the lead agency evaluated the localized air quality impacts from future permitted processes (e.g., material handling equipment and stockpiles) at the project site, however, the lead agency failed to calculate the project's localized air quality impacts from the remaining non-permitted processes (e.g., fugitive dust emissions and auxiliary equipment) that must be accounted for under CEQA. Further, the lead agency restricted the LST analysis to PM10 and PM 2.5 emissions, however, the AQMD's adopted LST methodology recommends that the lead agency evaluate PM10, PM2.5, NOX, and CO criteria pollutant emissions in the analysis. Therefore, AQMD staff requests that the lead agency revise the draft EIR to include a localized air quality analysis that is consistent with the AQMD's adopted LST methodology; thereby, including all emissions sources from the proposed project and their respective criteria pollutant (i.e., PM10, PM2.5, NOX and CO) impacts. The results from the localized air quality analysis should then be compared with the applicable LST.

In addition to the recommended regional significance thresholds the LSTs are used to indicate whether ambient air quality standards are exceeded locally when preparing a CEQA document. The AQMD staff recommends that the lead agency quantify localized impacts by either performing dispersion modeling or using the LSTs developed by the AQMD and restricting the footprint of construction activity to five acres or less per day. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

### Quantification of Regional and Localized PM2.5 Emissions

3. As part of the analysis recommended in comment #2 above, AQMD staff also recommends analyzing localized PM2.5 emissions impacts from the proposed project and comparing them to the LSTs for PM2.5. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.htm](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.htm).

### Air Quality Mitigation Measures

4. In the event that the lead agency's revised CEQA document requested in comments #1 through #3 demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines that minimizes or eliminates these impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Also, a list of mitigation measures can be found on the AQMD's CEQA webpage at the following internet address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.htm](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm)

### Fugitive Dust Mitigation Measures

5. Based on the URBEMIS output sheets provided in Appendix E of the draft EIR the lead agency indicates that the proposed project will mitigate fugitive dust emissions during the placement of the soil-cement fill (Phase D) by 84% with the application of soil stabilizers. Therefore, AQMD staff requests that the lead agency revise Section 3.2 (Air Quality) of the draft EIR to include a mitigation measure that will explicitly require an 84% reduction from fugitive dust emissions during the aforementioned phase. Further, AQMD staff requests that the lead agency demonstrate the effectiveness of the proposed mitigation by including technical data (e.g., technical data sheets) that identifies the product information.